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Global Crossing

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BY OVERNIGHT MAIL

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
TW-A325
Washington, D.C. 20554

Re: CC Docket Nos. 96-262, *et al.* (CALLS Proposal)

Dear Ms. Salas:

Enclosed please find an original plus fifteen (15) paper copies and one diskette copy of the Comments of Global Crossing North America, Inc. in the above-captioned proceedings.

To acknowledge receipt, please affix an appropriate notation to the copy of this letter provided herewith for that purpose and return same to the undersigned in the enclosed, self-addressed envelope.

Very truly yours,

Michael J. Shortley, III

cc: Ms. Wanda Harris (3)

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Before the
FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of	)	
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Access Charge Reform	)	CC Docket No. 96-262
	)	
Price Cap Performance Review for Local Exchange Carriers	)	CC Docket No. 94-1
	)	
Low-Volume Long Distance Users	)	CC Docket No. 99-249
	)	
Federal-State Joint Board on Universal Service	)	CC Docket No. 96-45

COMMENTS OF GLOBAL CROSSING NORTH AMERICA, INC.

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March 31, 2000

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Summary

Global Crossing appreciates the efforts of CALLS to propose meaningful reform to interstate access charges and universal service. The revised plan builds on the strengths of the original plan and offers significant public interest benefits. Specifically, the revised plan can provide a more economically efficient way to recover interstate access costs than under existing rules, while significantly decreasing telephone rates for many subscribers.

Global Crossing can support most aspects of the CALLS proposal, but emphasizes that it will only offer its total support if the Commission adopts some targeted adjustments that will address concerns specific to smaller carriers, that will promote additional pro-competitive ends, and that will deliver the greatest public interest benefit.

First, the Commission should exempt mid-size carriers from taking an arbitrary reduction in traffic-sensitive charges on July 1, 2000 simply because the larger price cap incumbent LECs have agreed to absorb the revenue loss in a particular way. *Second*, the Commission should not rely on pooling as the only means to reduce the impact that mid-size carriers will face on July 1, 2000 as a result of the arbitrary traffic sensitive reductions. *Third*, the Commission should adopt a lower X-factor for low-cost mid-size carriers to recognize that opportunities for increased productivity growth are fewer for these carriers than for larger or high-cost carriers. *Fourth*, the Commission should not require mid-size carriers to file forward-looking cost data to verify SLC caps and instead should rely on existing proxy cost data. *Fifth*, the Commission should direct

some of the access charge savings proposed by CALLS to tandem-switching rates. *Finally*, the Commission should permit voluntary participation in the CALLS plan.

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COMMENTS OF GLOBAL CROSSING NORTH AMERICA, INC.

Introduction

Global Crossing North America, Inc. ("Global Crossing"), on behalf of its domestic interexchange and exchange carrier subsidiaries, respectfully submits these comments in response to the Commission's March 8, 2000 Public Notice in the above-captioned proceeding. [1]

Global Crossing appreciates the efforts of CALLS to propose meaningful reform to interstate access charges and universal service. The revised plan builds on the strengths of the original plan and offers significant public interest benefits. Specifically, the revised plan can provide a more economically efficient way to recover interstate access costs than under existing rules, while significantly decreasing telephone rates for many subscribers.

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1 Public Notice, *Coalition for Affordable Local and Long Distance Services (CALLS) Modified Proposal*, CC Docket Nos. 96-262, 94-1, 99-249, and 96-45, DA 00-533 (March 8, 2000).

Global Crossing can support most aspects of the CALLS proposal, but emphasizes that it will only offer its total support if the Commission adopts some targeted adjustments that will address concerns specific to smaller carriers, that will promote additional pro-competitive ends, and that will deliver the greatest public interest benefit.

First, the Commission should exempt mid-size carriers[2] from taking an arbitrary reduction in traffic-sensitive charges on July 1, 2000 simply because the larger price cap incumbent local exchange carriers ("LECs") have agreed to absorb the revenue loss in a particular way. *Second*, the Commission should not rely on pooling as the only means to reduce the impact that mid-size carriers will face on July 1, 2000 as a result of the arbitrary traffic sensitive reductions. *Third*, the Commission should adopt a lower X-factor for low-cost mid-size carriers to recognize that opportunities for increased productivity growth are fewer for these carriers than for larger or high-cost carriers. *Fourth*, the Commission should not require mid-size carriers to file forward-looking cost data to verify subscriber line charge ("SLC") caps and instead should rely on existing proxy cost data. *Fifth*, the Commission should direct some of the access charge savings proposed by CALLS to tandem-switching rates. *Finally*, the Commission should permit voluntary participation in the CALLS plan.

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[2] "Mid-size carrier" should be defined as a local exchange carrier with fewer than two percent of the Nation's subscriber lines installed in the aggregate nationwide.

Argument

I. THE MODIFIED CALLS PLAN PROVIDES SIGNIFICANT PUBLIC INTEREST BENEFITS.

A. The Modified Calls Proposal Correctly Advances Common Line Reform.

For almost two decades, the Commission has been drafting regulations to permit incumbent LECs to recover costs associated with their provision of interstate access services.[3] One of the basic economic principles employed by the Commission is that non-traffic sensitive ("NTS") costs, or costs that do not vary with the amount of usage, should be recovered on a flat-rated basis from the cost causers. While the Commission's current regulations permit carriers to recover some of the non-traffic sensitive loop costs from end-users through the SLC, the Commission has not engaged in meaningful reform that would permit total recovery of those NTS costs in a manner that is consistent with this basic economic principle. In the absence of a more fundamental change in the manner of recovery of NTS costs assigned to the interstate jurisdiction, Global Crossing recognizes that the modified CALLS proposal represents a significant step to advance common line reform.

As modified, the CALLS plan recommends that common line charges will be unified for primary and non-primary residential and single line businesses into one charge. The proposal provides new caps for multi-line businesses, as well as permitting SLCs to be deaveraged subject to certain conditions. In addition,

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[3] *See MTS and WATS Market Structure*, CC Docket No. 78-72, Third Report and Order, 93 F.C.C. 2d 241 (1983); *Access Charge Reform*, CC Docket Nos. 96-262, 94-1, 99-249, and 96-45, First Report and Order, FCC 97-158 (1997) ("Access Charge Reform First Report and Order").

the modified CALLS plan holds Lifeline customers harmless against SLC increases.

Global Crossing supports these proposals and encourages the Commission to adopt them. The modified plan moves more of the non-traffic sensitive costs from usage-based access charges to flat-rated end user charges, thereby creating a more economically sound cost recovery structure, and ultimately generating additional consumer surplus. The Commission has repeatedly recognized this result from making its cost recovery framework more consistent with economic principles. While the original plan was bolder,[4] the SLC increases proposed in the modified plan represent the necessary balance among all interested parties to achieve common line reform today.

Further, although the modified proposal combines the SLC and primary interexchange carrier charge ("PICC") for primary and non-primary residential and single-line businesses, it keeps these charges separate for multi-line businesses. Much of the confusion to date regarding PICCs involves residential and single line business consumers and thus it is necessary to address their needs first. The magnitude of the confusion for multi-line business subscribers, however, is significantly less. Also, as stated in the modified CALLS plan, the multi-line business PICC falls dramatically for most companies as a result of the

[4] The original CALLS plan proposed that SLCs for primary residential and single line businesses transition for a cap of $5.50 to $7.00 over the term of the plan. *See Access Charge Reform*, Notice of Proposed Rulemaking, CC Docket Nos. 96-262, 94-1, 99-249, and 96-45, FCC 99-235, Appendix A, § 2 (1999) ("Original Plan").

proposed reforms, thus eliminating the PICC issue for most of these subscribers.[5] This is an acceptable compromise arrangement.

B. The Modified CALLS Proposal Properly Reduces Switched And Special Access Rates.

Global Crossing supports the goal of the modified CALLS proposal to reduce traffic-sensitive and special access interstate rates and to establish agreed upon target rates for the carriers that, when hit, will set the productivity factor equal to the GDP-PI. As stated in the modified CALLS plan, the Commission's productivity offset has been the subject of extensive regulatory proceedings and litigation, and has created significant uncertainty in the marketplace.[6] The CALLS plan proposes to eliminate this uncertainty for a five-year period for both interexchange and exchange access carriers as the telecommunications industry transitions to a more competitive environment. Thus, Global Crossing encourages the Commission to adopt the mechanisms used by CALLS to reduce traffic-sensitive and special access rates.

Regarding the level of reductions, Global Crossing supports lowering traffic-sensitive charges to the proposed targets of $.0055 per minute for the Bell Operating Companies and GTE and $.0065 per minute for the other price cap incumbent LECs. As the Commission has properly recognized, access charges should reflect rates that would exist in a competitive market. The Commission also has recognized that reductions in the prices for usage-rated interstate

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5 *See* Memorandum in Support of the Revised Plan of the Coalition for Affordable Local and Long Distance Service, filed March 8, 2000 in CC Docket 96-262, et al., Appendix A, § 2 ("Modified CALLS Plan").

6 Modified CALLS Plan at 11.

access services are required to match those prices to the low level of usage-sensitive costs and to move access charges closer to forward-looking cost levels.[7] These reductions can bring substantial public interest benefits: competitive distortions can be reduced or eliminated, demand for long distance service would be stimulated, and some of the tension between the pricing of circuit-switched services and packet-switched services would be reduced.

For these reasons, Global Crossing encourages the Commission to adopt the traffic-sensitive rate reductions identified in CALLS, as well as adopting the proposed reductions in special access rates, so long as they are matched with offsetting SLC and PICC changes and the modifications stated below.

II. THE MODIFIED CALLS PROPOSAL MUST BE AMENDED TO RECOGNIZE THE SPECIAL CHARACTERISTICS OF SMALLER CARRIERS.

A. The Commission Should Eliminate The Arbitrary Reduction In Traffic Sensitive Rates For Mid-Size Price Cap ILECs.

The modified CALLS proposal clearly recognizes differences between the Bell Operating Companies and GTE, the largest incumbent LECs, and the other mid-size price cap carriers. Section 3.1 of the Modified Plan establishes a separate target rate for traffic-sensitive charges for the mid-size price cap carriers and even recognizes that another target may be appropriate for an entirely rural price cap company.[8] In addition, Section 3.2.4.1 (pooling) attempts to provide additional stability for rural study areas served by the smaller price cap

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7 Access Charge Reform First Report and Order at para. 43.

8 Modified CALLS Plan, Appendix A at § 3.1.

carriers during the transition to the target rates.[9] While these proposals seek to provide some relief for mid-size price cap incumbent LECs, the latter provision operates in a manner that is not consistent with the public interest and would be both anti-competitive and adverse to consumers. Further, these proposals do not sufficiently address the arbitrary reduction in traffic sensitive charges that would take place on July 1, 2000.

B. Pooling Is Not An Effective Option For Mid-Size Carriers Serving Competitive Markets.

As stated in the draft proposed rules, the CALLS plan would permit certain mid-size carriers to pool local switching revenues in their common line basket to make up for some of the lost revenues resulting from that carrier's portion of the one-time $2.1 billion reduction in traffic-sensitive charges. The pooling mechanism is intended to permit the carrier to recover revenues from either multi-line business PICCs and/or multi-line business SLCs until the nominal caps are reached for the rural filing entity. Once the caps are reached, the rural carrier may look to other filing entities for revenue recovery.[10]

Global Crossing appreciates the creative effort of the CALLS group to craft a mechanism that could help some price cap carriers to mitigate the one-time traffic-sensitive rate reductions agreed to by the larger carriers, but the proposal fails to recognize the competitive pressures faced by other price cap carriers. For mid-size carriers to take advantage of pooling, they would have to increase rates in their most competitive markets or increase rates on subscribers that are

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9 *Id.*, at § 3.2.4.1.

10 Modified CALLS Plan, Appendix B, Proposed Rules for 47 C.F.R. 61.48(m).

afforded the most choice among service providers. This reduces their competitiveness in those markets, reduces the effective operation of market forces, and ultimately limits choices for many customers. As a result, pooling is not an effective solution and thus does not serve the public interest. These provisions were developed with good intentions, but without input from all affected carriers, and reflect a misdirected policy solution. On its face, a pooling solution should not be presumed to be the best alternative in any event. Pooling would constitute "relief" in name only and would have no practical usefulness in a competitive marketplace. Indeed, it would be counterproductive. Affected carriers should be able to choose not to pool and should not be required to take the arbitrary reduction in traffic-sensitive rates on July 1, 2000.

C. Mid-Size Price Cap Carriers Should Be Subject To A Lower X.

Global Crossing has long supported the Commission's price cap regime and was one of the first independent carriers to elect to participate in incentive-based regulation. Over the past decade, the Commission has continued to revise and attempt to perfect its rules by experimenting with different X-factors based on the needs of consumers and industry.[11] As stated on many occasions, the X-factor attempts to represent the amount by which price cap incumbent LECs can be expected to outperform economy-wide productivity gains. The Commission now has the opportunity, as part of the modified CALLS proposal, to recognize that not all price cap carriers are "equal" in their productivity growth,

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[11] Based on different theories, the Commission has adopted productivity factors of 3.3% and 4.3% (1990); 4.0%, $4.7% and 5.3% (1995); and most recently 6.5% (1997). *See* Further Notice of Proposed Rulemaking, *Price Cap Performance*

and that the point at which carriers can outperform the market in terms of productivity is finite.

Many mid-size carriers serve both rural and non-rural exchanges, and as stated in the modified CALLS plan, have much different and more limited economies of scale than larger LECs.[12] Further, several carriers are low-cost carriers -- *i.e.*, their loops have an average non-traffic sensitive revenue requirement substantially below the national average.[13] As a result, low-cost carriers have fewer opportunities to improve productivity growth. As one study has already demonstrated, "[c]ompanies that already have low unit costs tend to have slower productivity growth."[14] In other words, they have sought to operate efficiently and succeeded -- *not* requiring regulators to create any artificial spur to be cost-competitive. As a result, Global Crossing encourages the Commission to adopt a lower X that can be applied to both special and switched access services for mid-size incumbent LECs. As part of its filing in response to the Original Plan, Cincinnati Bell requested an X-factor that would be at least 1% lower than the X-factor for large companies.[15] Global Crossing supports the Cincinnati Bell

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Review for Local Exchange Carriers, CC Docket 94-1, FCC 99-345 (1999) (Price Cap FNPRM), at para. 9.

12 Modified CALLS Plan at 14.

13 Global Crossing's local telephone operations, for example, serve over one million lines in the United States, of which, approximately 70% have loop costs substantially below the national average. Global Crossing has more low cost study areas than any other ILEC in the nation, a fact easily discernable from publicly-available NECA data.

14 *One Size Does Not Fit All: Further Evidence Against the Adequacy of a Single X-Factor*, Jeffry H. Rohlfs and Kirsten M. Pehrsson (April 23, 1998) filed on May 14, 1998, as part of an Independent Telephone and Telecommunications Alliance ex parte letter in CC Docket 94-1.

15 Comments of Cincinnati Bell Telephone Company, CC Docket Nos. 96-262, 94-1, 99-249, and 96-45 (filed Nov. 12, 1999).

request and would apply the lower X to both switched and special access services.

It is important to note that adopting a lower X-factor for smaller price cap ILECs will not undermine the modified CALLS proposal. A lower X will still transition mid-size carriers to the target rates, but simply at a slower pace. In addition, a lower X for these carriers will have minimal -- indeed, insignificant -- impact on the $2.1 billion reduction that the parties to CALLS have agreed in 2000. As such, a lower X will not disturb the delicate balance sought by the signatories of the proposal, but it will help eliminate the inequities that exist between mid-size and large price cap carriers.[16]

D. Mid-Size Carriers Should Not Be Required to File Forward-Looking Cost Data.

Section 2.1.2.2.3 of the modified CALLS plan states that the Commission should initiate a proceeding for purpose of verifying that the progression of the change in the primary residence/single line business SLC cap beyond the $5.00 cap is appropriate in the unbundled network element ("UNE") zones where they would apply and that the progression reflects higher costs in those zones.[17] In this proceeding, the incumbent LEC CALLS members have agreed to provide economic data, including the forward-looking costs associated with the provision

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[16] For similar reasons, foregoing the one-time reduction of traffic-sensitive charges on July 1, 2000 for mid-size carriers will have minimal impact on the agreement reached by the CALLS members.

[17] Modified CALLS Plan, Appendix A, § 2.1.2.2.3.

of retail voice grade access to the public-switched telephone network, for those areas.[18]

To the extent that the Commission supports this aspect of the CALLS proposal, it should not require mid-size carriers to similarly submit forward-looking economic cost data. Such information can be gathered from existing proxy cost models. To impose such a requirement on mid-size carriers is simply too burdensome, especially if other comparable data is readily available.

E. The Commission Should Require A Proportionate Share Of The One-Time Reduction In Traffic Sensitive Rates To Come From Tandem- Switching Rates.

The modified CALLS plan seeks to achieve a total of $2.1 billion in access charge reductions on July 1, 2000. The parties to CALLS have agreed that some of the reductions to average traffic-sensitive charge rates will be calculated as a percentage of the local switching element of all price cap LECs. Carriers may take these reductions against any of the average traffic-sensitive rate elements, but at least a proportionate share of the reductions must be taken from local switching.[19]

To promote competitive neutrality, the Commission should modify the CALLS plan further to require incumbent LECs to reduce tandem-switching rates by at least a proportionate share of the additional reduction. Under the current proposal, the largest interexchange carriers stand to gain the most from the access charge reductions because incumbent LECs are more likely to drop rates

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18 *Id. See also* Ex Parte Letter from Kathleen M. H. Wallman, Wallman Strategic Consulting, LLC to Magalie Roman Salas, Secretary, Federal Communications Commission, dated March 29, 2000.

19 Modified CALLS Plan at 13.

for direct-trunked transport than tandem-switching. As a result, smaller interexchange carriers that rely heavily on tandem-switching could be placed at a competitive disadvantage vis-à-vis the larger interexchange carriers. This inequity easily can be resolved by requiring price cap incumbent LECs to take at least proportionate reductions in tandem-switching rates on July 1, 2000.

III. THE MODIFIED CALLS PROPOSAL WILL YIELD SAVINGS FOR CONSUMERS.

There should be little doubt that most consumers will be better off with the modified CALLS proposal than without it. Appendix E to the proposal provides a good example. End users that make few or no long distance calls will receive savings of at least several dollars per month, with some subscribers receiving savings of at least $4.00 per month.[20] Alternatively, without the proposal, primary residential subscribers would face a higher PICC,[21] there will continue to be confusion regarding the PICC itself, and AT&T will continue to have a minimum usage charge for its basic schedule callers. In addition to the benefits received by primary residential and low-volume callers, all customers stand to gain from lower usage rates and a more economically efficient pricing structure.

Global Crossing also supports the commitments made by AT&T and Sprint to have at least one calling plan with no minimum usage. Global Crossing supports these voluntary commitments and is willing to make a similar commitment for the benefit of low volume residential callers so long as other major interexchange carriers agree to do so as well.

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[20] Modified Calls Plan, Appendix E.

[21] *See* 47 C.F.R. § 69.153(c)(2).

IV. PARTICIPATION IN THE PLAN SHOULD BE VOLUNTARY.

The Commission now has before it two significant proposals for addressing interstate access charges -- the modified CALLS plan and the outstanding rulemaking on the productivity factor. As the Commission has done in the past, it should give price cap incumbent LECs the opportunity to opt into either regulatory regime.[22] This flexibility is needed to give carriers the opportunity to respond to the competitive pressures they face in the marketplace. Global Crossing would prefer to make a voluntary choice, and it is good policy for the Commission to promote that end. Promoting voluntary carrier election also could effectively remove one of the Commission's primary risks with any major policy shift in this area -- that an adversely-affected carrier would choose to litigate a Commission-prescribed plan.

Conclusion

For the foregoing reasons, the Commission should adopt the modified CALLS plan -- but only with the modest adjustments that are outlined herein. While the modified plan has many improvements over the current regime, Global Crossing could only support the plan if the Commission adopts these changes.

[22] To the extent the Commission finds it necessary to adopt a separate X-factor in response to the Price Cap FNPRM, then Global Crossing would encourage the Commission to adopt a lower productivity factor for the same reasons identified herein.

Otherwise, the plan will not have been *best* targeted to meet public interest needs. In addition, the Commission should permit voluntary participation in the plan.

Respectfully submitted,

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John S. Morabito

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March 31, 2000

Certificate of Service

I hereby certify that, on this 31st day of March, 2000, copies of the foregoing Comments of Global Crossing North America, Inc. were served by first-class mail, postage prepaid, upon the parties on the attached service list.

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Michael J. Shortley, III

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Attachment A

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